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>

To: <dwear@fs.fed.us>, <jgreis@fs.fed.us>  
cc:  
Subject: Comments on Southern Forest Resource Assessment

02/28/02 12:24 PM

Dear Mr. Greis and Mr. Wear:

Texas Committee on Natural Resources (TCONR), a statewide conservation organization with a long history of addressing forest issues, especially those concerning national forests, appreciates the opportunity to submit comments on the Southern Forest Resource Assessment (SFRA).

While we concur with the importance of urban sprawl as a factor in reducing the acreage and productivity of our Southern forests, we strongly urge that the final SFRA document give equal or greater emphasis to the impacts on Southern forests from the continued expansion of industrial forestry and the high-impact management practices employed by the timber industry.

Clearcutting and other forms of even-aged logging, overuse of prescribed burning, abuse of the mid-story removal provisions in the RCW guidelines for national forests, decreases in logging rotations, and the increasing use of fertilizers and pesticides are reducing the natural forests of the South and replacing them with pines-only monocultures that support dramatically less wildlife and lead to increased erosion, loss of soil nutrients, and stream siltation. Road building, prescribed burning, hardwood mid-story removal, seed tree cutting, and clearcutting are destroying the cavity trees and food-producing hardwoods on which many wildlife species depend. These management activities so alter the structure of the forest, its species composition, moisture microclimate, shrub composition, herb composition, and other forest attributes that birds and animals are being crowded into smaller and smaller areas, even where urban sprawl is not a factor.

To refer to these high-impact management actions as "sustainable" is ridiculous.

Of particular concern are the fast-vanishing bottomland hardwood forests and the almost-eliminated longleaf pine habitat. If industrial forest companies and the U.S. Forest Service continue to shorten cutting rotations, to convert hardwood and mixed forests to pine crops, to allow cutting close to stream courses, to remove hardwood mid-story from RCW colonies, and to expand their use of prescribed burning and of chemicals to eliminate hardwood species from pine plantations, our forests would remain in decline even if urban sprawl were stopped dead in its tracks. And since the probability of stopping urban sprawl in the South is unlikely to the point of being vanishingly small, the SFRA report needs to focus more heavily on the impacts of our current forest methods, which can be changed.

Sincerely,

David Gray, Chairman  
Richard Donovan, Forest Task Force Chair

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